

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
VALDOSTA DIVISION**

KENNETH JOHNSON and JACQUELYN
JOHNSON, as Co-Administrators
for and on Behalf of The Estate of
KENDRICK LAMAR JOHNSON, A Minor

Plaintiff,
vs.

BRIAN BELL, BRANDON BELL,
RICHARD "RICK" BELL, et al.

Defendants.

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CIVIL ACTION

No. 7:20-cv-00004-HL

**PLAINTIFF'S RESPONSE TO THE COURT'S SHOW CAUSE ORDER
OF JUNE 1, 2020**

NOW COME Plaintiffs KENNETH JOHNSON and JACQUELYN JOHNSON, by and through the undersigned and in response to this Court's Show Cause Order of June 1, 2020, wherein it is directed that plaintiffs file by June 8, 2020 a written explanation regarding plaintiffs' failure to accomplish service of process according to the dictates of Rule 4(m) of the Federal Rules of Civil Procedure, plaintiffs respectfully submit for this Court's consideration the following:

1. On January 9, 2020, plaintiffs filed the instant action and, as such, are required by Rule 4(m) to have accomplished service of the complaint upon the defendants within 90 days after its filing. Accordingly, the deadline for completing service of process was April 8, 2020.

2. Shortly after filing the complaint in this case, the undersigned sought to identify the whereabouts of the defendants inasmuch as some of them reportedly lived in the State of Florida.

3. In an effort to effectuate service of process upon Branden Bell, Brian Bell and Richard Bell, the undersigned contacted Attorney Brice Ladson to establish whether he would accept service of process for them. Atty. Ladson indicated that he would not or could not because he was not their attorney in this action. Thereafter, the undersigned hired an investigator from the Jacksonville, Florida area in an effort to locate the residences where the Bells could be found.

4. During the beginning of March 2020, the undersigned was advised that because of his age and health history that he was considered to be in a high risk category for COVID-19.

5. Inasmuch as the community where the undersigned resides became a hotspot for the COVID-19 pandemic, the undersigned was hampered in his attempt to effectuate timely service of process in this case.

Respectfully submitted this 8th day of June 2020.

THE C.B. KING LAW FIRM

By: /s/Chevene B. King, Jr.

Chevene B. King, Jr.,
Attorney for Plaintiffs

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